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MEMO ENDORSED

December 13, 2022

12/13/22

VIA ECF

The Honorable Colleen McMahon  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

OK

Colleen McMahon

Re: *United States v. Ezequiel Guzman, 11-CR-514 (CM)*

Dear Judge McMahon:

I am the attorney for Ezequiel Guzman, defendant in the above-referenced matter, who has filed a motion for compassionate release, pursuant to 18 U.S.C. § 3582 (c)(1)(A). By letter dated November 9, 2022, I informed the Court that Mr. Guzman was currently on home confinement and that having reviewed Mr. Guzman's motion and discussed it with him, I did not have any additional facts or arguments to add to the motion and did not intend to file a supplemental motion.

I subsequently discussed this matter with the Government and was informed that while Mr. Guzman was on home confinement, he has been returned to BOP custody, following an administrative decision by the BOP. I did not have prior knowledge of this proceeding and was not informed that my client had been returned to BOP custody, at FCI Victorville.

In light of that development, I request an additional 30 days to confer with my client to determine if there are any additional facts or circumstances that could supplement his compassionate release application. I have conferred with Assistant United States Attorney Maggie Lynaugh, who has no objection to this request. The Defense would also consent to an additional 30 days for the Government to respond, following the proposed 30-day extension requested by the Defense.

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I thank the Court for its consideration.

Respectfully submitted,  
/s/  
Renato C. Stabile

cc: AUSA Maggie Lynaugh  
(via ECF)  
Ezequiel Guzman  
(via regular mail)

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